

Weil, Gotshal & Manges LLP

767 Fifth Avenue
New York, NY 10153-0119
+1 212 310 8000 tel
+1 212 310 8007 fax

Daniel L. Stein
+1 (212) 310-8140
Daniel.Stein@weil.com

June 18, 2025

ELECTRONICALLY FILED

The Honorable Jennifer H. Rearden
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Menachem Lieberman*, 23-cr-4-JHR-2

Dear Judge Rearden:

We represent the defendant, Menachem Lieberman, in the above-captioned matter. We write to respectfully request a one-week adjournment of Mr. Lieberman's sentencing to allow counsel sufficient time to evaluate and briefly respond to the Government's letter filed late last night (ECF No. 630). In addition to the significant factual arguments contained therein, the Government, for the first time, stated its position that Mr. Lieberman has breached his plea agreement, and now seeks to deny Mr. Lieberman credit for acceptance of responsibility and advocates for a higher sentence than previously requested.

In order to properly consider these arguments before sentencing, and to inform the Court of our positions particularly with respect to Mr. Lieberman's alleged breach of his plea agreement and his acceptance of responsibility credit, we propose that the defense submit a brief response (not to exceed five pages) no later than June 25, 2025, with sentencing to be scheduled on or after June 30, 2025.

The Government has informed us that it takes no response on our request for an adjournment or the timing of our reply.

Respectfully submitted,

/s/ *Daniel L. Stein*
Daniel L. Stein


cc: Assistant United States Attorneys Daniel Wolf, Stephanie Simon, and Catherine Ghosh (via ECF)

Defendant Lieberman's application to adjourn the sentencing hearing scheduled for June 23, 2025 is denied. This sentencing, initially scheduled for July 9, 2024, has already been adjourned several times.

Defendant shall submit his reply, if any, to the Government's June 17, 2025 letter by **June 20, 2025**.

The Clerk of Court is directed to terminate ECF No. 634.

SO ORDERED.


Jennifer H. Rearden, U.S.D.J.
Dated: June 18, 2025